

Q3. Children of all require child-friendly, jargon free, visualised information that protects their identity and their privacy. Children have varying levels of capacity and ability to consent. Design should be based on the lowest levels of capability rather than the highest levels. Children's autonomy on digital devices are being promoted and encouraged by parents as well as other adults (e.g. teachers). It cannot be assumed that this autonomy comes with knowledge. Basing all information giving (e.g. teaching at schools) and design on evidence based judgments about child's cognitive and emotional capacity, will maximise the likelihood that children will experience a safe and appropriate environment online.

Children require and deserve better default settings and a design code that works with their development rather than against it, especially with regard to design which encourages extended use by intermittently reinforcing the child's use, reminding them of lack of use and making claims that are unsubstantiated. All of these factors misuse child development knowledge which clearly demonstrates the cognitive and emotional vulnerability of children.

The best interest of the child needs to be paramount at each level of design, so that the responsibility for appropriate, developmentally beneficial digital use is on the design services rather than on the child.

The collection of data should fall within the Data Minimisation Standards (GDPR), with clear regulations around expiry. Children should have the right not to be profiled and to be able to erase any messages or photos they have put online.

We are asking so much of children online and there are so few safeguards put in place. Instead the vulnerabilities of children are exploited. We need to use the detail and the spirit of the UN Convention on the Rights of the Child to inform this code.